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Attorneys for Defendant

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11 UNITED STATES DISTRICT COURT  
12 EASTERN DISTRICT OF CALIFORNIA  
13 SACRAMENTO DIVISION  
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16 NATALIA TSUBERA,	)	CIVIL NO. 2:24-cv-01789-AC
Plaintiff,	)	
v.	)	<b>STIPULATION TO VOLUNTARY</b>
18 COMMISSIONER OF SOCIAL SECURITY,	)	<b>REMAND PURSUANT TO SENTENCE</b>
19 Defendant.	)	<b>FOUR OF 42 U.S.C. § 405(g) AND TO</b>
	)	<b>ENTRY OF JUDGMENT; [PROPOSED]</b>
	)	<b>ORDER</b>
	)	
	)	
	)	

22 IT IS HEREBY STIPULATED, by and between the parties, through their undersigned  
23 attorneys, and with the approval of the Court, that the Commissioner of Social Security  
24 (“Commissioner”) has agreed to a voluntary remand of this case pursuant to sentence four of 42  
25 U.S.C. § 405(g). The purpose of the remand is to offer Plaintiff a new decision.

26 On remand, the Commissioner will further develop the record as necessary, and issue a  
27 new decision. The parties further request that the Clerk of the Court be directed to enter a final  
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1 judgment in favor of Plaintiff, and against Defendant, reversing the final decision of the  
2 Commissioner.

3 Respectfully submitted this December 13, 2024

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5 DATED: December 13, 2024

/s/ Jesse S. Kaplan\*  
(\*as authorized via e-mail on December 12, 2024)  
JESSE S. KAPLAN  
Attorney for Plaintiff

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7  
8 DATED: December 13, 2024

PHILLIP A. TALBERT  
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12 By: /s/ Mary Tsai  
MARY TSAI  
Special Assistant U.S. Attorney  
Office of Program Litigation, Office 7  
13 Attorneys for Defendant  
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15 **ORDER**

16 Based upon the parties' Stipulation to Voluntary Remand Pursuant to Sentence Four of  
17 42 U.S.C. § 405(g) and to Entry of Judgment, and for cause shown, IT IS ORDERED that the  
18 above-captioned action is remanded to the Commissioner of Social Security for further  
19 proceedings pursuant to the Social Security Act § 205(g), as amended, 42 U.S.C. § 405(g),  
20 sentence four. On remand, the Appeals Council will remand the case to an administrative law  
21 judge (ALJ) for a new decision.

22 DATED: December 13, 2024

Allison Claire  
ALLISON CLAIRE  
UNITED STATES MAGISTRATE JUDGE